

EXHIBIT 3

EXHIBIT 6.3

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC GROWTH
EMPLOYMENT RELATIONS COMMISSION
LABOR RELATIONS DIVISION
PETITION FOR REPRESENTATION PROCEEDINGS

INSTRUCTIONS: Submit an **original** and **4 copies** of this Petition to: Employment Relations Commission, Cadillac Place, 3026 W. Grand Boulevard, Suite 2-750, PO Box 02988 Detroit MI 48202-2988. (Use additional sheets if necessary.)

DO NOT WRITE IN THIS SPACE

Case Number

UC14 F- 010

Date Filed

6/16/14

1. Purpose of this Petition: (Check only the one box which is appropriate.)

- A. ☐ **RC - CERTIFICATION OF REPRESENTATIVE** - 30% or more of employees in the unit wish to be represented for purposes of collective bargaining by Petitioner, and Petitioner desires to be certified as representative of the employees for purposes of collective bargaining. (A 30% showing of interest must accompany this form or be submitted within 48 hours.)
- B. ☐ **RM - REPRESENTATION (EMPLOYER)** - One or more individuals or labor organizations have presented a claim to Petitioner to be recognized as the representative of employees of Petitioner.
- C. ☐ **RD - DECERTIFICATION** - 30% or more of employees in the unit assert that the certified or currently recognized bargaining representative is no longer their representative. (A 30% showing of interest must accompany this form or be submitted within 48 hours.)
- D. ☐ **SD - SELF-DETERMINATION** - Multiple units represented by the same representative seek to be represented in one unit. (No showing of interest required.)
- E. ☒ **UC - UNIT CLARIFICATION** - A labor organization is currently recognized by the employer, but Petitioner seeks clarification of placement of certain employee(s). (A petition for unit clarification does not raise a question concerning representation, and may not be used where an RC or RM petition is appropriate.)

2. NAME AND ADDRESS OF EMPLOYER: City of Detroit, Water and Sewerage Department 735 Randolph St. Detroit, MI 48226		TELEPHONE NUMBER: (313.00) 2,678,000.00
3. TYPE OF EMPLOYER: Check appropriate box: <input checked="" type="checkbox"/> Governmental <input type="checkbox"/> Private		
4. DESCRIPTION OF CLAIMED BARGAINING UNIT INVOLVED: In UC petition, describe present bargaining unit and attach specific description of proposed clarification. Please use additional paper if necessary. INCLUDED: See attached pleadings and exhibits EXCLUDED:		5. APPROXIMATE NUMBER OF EMPLOYEES IN UNIT: 1,000.00 6. DATE OF DEMAND FOR RECOGNITION: 4/3/14 DATE EMPLOYER DECLINED RECOGNITION:
7. RECOGNIZED OR CERTIFIED BARGAINING AGENT, OR PARTIES OTHER THAN PETITIONER WHICH HAVE CLAIMED RECOGNITION AS REPRESENTATIVES, AND OTHER UNIONS INTERESTED IN THE EMPLOYEES DESCRIBED IN ITEM 4 ABOVE (If NONE, so state): NAME AND ADDRESS: IUOA-500 Hulet Drive, Bloomfield Twnsp., 48302; See attached		DATE OF RECOGNITION OR CERTIFICATION: Note applicable DATE OF CLAIM: (Required only if RM Petition) Not applicable
8. DATE OF EXPIRATION OF CURRENT CONTRACT, IF ANY: Month: April Day: 30.00 Year: 2,018.00		
I HAVE READ THE ABOVE PETITION AND IT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.		
PETITIONER AND AFFILIATION, IF ANY: Michigan AFSCME Council 25, AFL-CIO, Locals 207 & 2920		
NAME OF REPRESENTATIVE OR PERSON FILING PETITION: SIGNATURE: <i>Tere McKinney</i> PRINTED: Tere M. McKinney		TITLE, IF ANY: Staff Attorney
ADDRESS: 600 W. Lafayette Blvd., 5th Floor Detroit, Michigan 48226		TELEPHONE: 313 964-1711

The Department of Labor & Economic Growth will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, disability or political beliefs. If you need assistance with reading, writing, hearing, etc., under the Americans with Disabilities Act, you may make your needs known to this agency.

**CITY OF DETROIT, WATER AND SEWERAGE DEPARTMENT
UNIT CLARIFICATION PETITION**

Additional Interested Parties

UAW Local 504, 8000 E Jefferson Ave, Detroit, MI 48214

Building Trades, 1640 Porter St., Detroit, MI 48216

Teamsters, 2825 Trumbull St., Detroit, MI 48216

IUOE Local 324, 1550 Howard St., Detroit, MI 48216

dat/324iuoeaflcio

STATE OF MICHIGAN
EMPLOYMENT RELATIONS COMMISSION
LABOR RELATIONS DIVISION

In the Matter of:

DETROIT WATER AND SEWERAGE DEPARTMENT
Respondent-Public Employer,

Unit Clarification Petition

-and-

AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
MICHIGAN COUNCIL 25, LOCALS 207 & 2920
Petitioner-Labor Organization,

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STATE OF MICHIGAN
EMPLOYMENT RELATIONS COMMISSION

PETITIONER-LABOR ORGANIZATION'S
UNIT CLARIFICATION PETITION

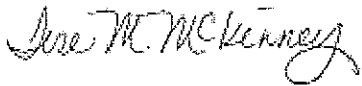
NOW COMES Petitioner, AFSCME Council 25, and its affiliated Locals 207 and 2920,
by and through its attorney, Tere M. McKinney, files this Unit Clarification Petition Pursuant to
Rule 423.143 and hereby states as follows:

1. The Employer City of Detroit – Department of Water and Sewage (Employer) and Michigan AFSCME Council 25, and its affiliated local 2920 (Union), are parties to a collective bargaining agreement (CBA) 2013-2018 (Ex. 1). Local 207 is and employer are parties to an expired agreement (Ex. 2). On or about October 5, 2012 the employer imposed the “City Employment Terms” (CET) on all bargaining units without a ratified agreement. (Ex. 3)
2. The Union and its affiliated locals 207 & 2920 represent a bargaining unit of all permanent full-time non-supervisory employees within the Department of Water and Sewage Division within the maintenance and clerical classifications. (Exhibit 1 & 2 , Article 1, Recognition of the Union and Exhibit 1)
3. On or around March 25, 2014 the Employer verbally notified the Union that it planned to remove a number of positions from the AFSCME bargaining units and place those positions in non-AFSCME units resulting in a displacement of over 1100 AFSCME members.
4. The employer seeks to unilaterally upset decades of established unit structure by re-titling certain positions. (Ex. 4)

5. The employer plans to implement its new classification system by July 6, 2014.
6. Petitioner requests clarification on the newly created and re-titled positions as there is no substantial change in duties that justify such drastic measures.

WHEREFORE, Petitioner respectfully requests that the Commission direct a hearing to clarify the unit with regards to the newly created and re-titled positions.

Respectfully Submitted,



BY:

Tere M. McKinney (P71567)
Attorney for Petitioner-Labor Organization
600 W. Lafayette Blvd., Suite 500
Detroit, MI 48226
Phone: 313-964-1711
Fax: 313-964-0230

Dated: June 13, 2014

dat/324iuoeaflcio

L 3311-207-14



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
MICHIGAN EMPLOYMENT RELATIONS COMMISSION
BUREAU OF EMPLOYMENT RELATIONS
RUTHANNE OKUN
DIRECTOR

STEVE ARWOOD
DIRECTOR

June 23, 2014

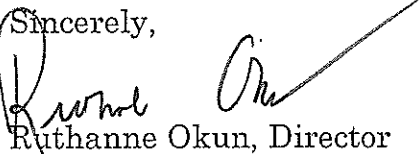
Michigan AFSCME Council 25, AFL-CIO
Ms. Tere McKinney
600 W. Lafayette Blvd. 5th Floor
Detroit, MI 48226

Re: City of Detroit, Water and Sewerage Dept.
MERC Case No.: UC14 F-010

Dear Ms. Tere McKinney:

As you are aware, the City of Detroit is in bankruptcy and all matters involving the City of Detroit are automatically stayed at this time. MERC is not able to take any further actions unless you can provide our Office that we have authority to proceed. Your Unit Clarification Petition filed June 16, 2014, concerning the Detroit Water and Sewerage Department is being held in abeyance at this time.

Sincerely,


Ruthanne Okun, Director
Bureau of Employment Relations/MERC

Cc: City of Detroit, Water and Sewerage Department
Attorney Steven Schwartz
IUOE, Local 324
Teamsters
Building Trades
UAW Local 504

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